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November 30, 2018

VIA ELECTRONIC FILING

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
South Carolina Public Service Commission
101 Executive Center Drive
Columbia, SC 29210

RE: Application of Carolina Water Service, Inc. to establish a Hydrant Meter Program
Docket No. 2018- 360-W

Dear Ms. Boyd,

As the record will reflect, I represent Carolina Water Service, Inc. ("CWS") in connection with the application for approval of a Hydrant Meter Program in the above docket pending before the Public Service Commission ("Commission").

The Office of Regulatory Staff ("ORS") filed its letter November 29, 2018 acknowledging that the program does not change rates for customers and informing the Commission that it "supports the establishment of a Hydrant Meter Program to help reduce water theft and revenue water." However, the ORS mistakenly stated in its letter that CWS did not provide a basis for the proposed meter deposit. Reference to the application reflects that the hydrant meters in question cost approximately \$1100.00 which formed the basis for the amount of the deposit. Directed at contractors and developers, the purpose of the proposed Hydrant Meter Program is to reduce water theft and revenue water, and therefore a deposit sufficient to recover the cost of the meter is just and reasonable. Regulation 103-731.1.B provides that the amount of customer deposits are to be based upon the experience of the customer and would support a deposit which would allow CWS the recovery of its cost of the meter. Assuming for the sake of argument that the Commission regulations do not otherwise support a deposit sufficient to secure recovery of the cost of the meter, a waiver of any such regulation would be in the public interest.

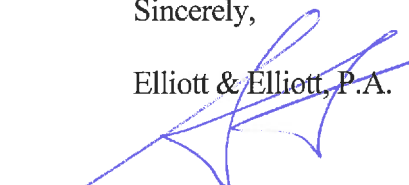
The ORS does not object to the application for approval of a Hydrant Meter Program and I am informed that the ORS does not object to the establishment of a deposit of \$1100.00 to secure recovery of the cost of the hydrant meter. On behalf of CWS, I would respectfully request that the Commission approve the application at its next agenda meeting.

Jocelyn Boyd, Esquire
Chief Clerk and Administrator
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If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Sincerely,

Elliott & Elliott, P.A.

A handwritten signature in blue ink, appearing to read 'Scott Elliott', is written over the text 'Elliott & Elliott, P.A.'.

Scott Elliott

cc: Jeffrey M. Nelson, Esquire

CERTIFICATE OF SERVICE


The undersigned employee of Elliott & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below:

RE: Application of Carolina Water Service, Inc. to establish a
Hydrant Meter Program
Docket No. 2018-360-W

PARTIES SERVED: Jeffrey M. Nelson, Esquire
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201

PLEADINGS: Letter

November 30, 2018



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